



February 18, 2004

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Ex Parte Presentation  
In the Matter of AT&T's Petition for Declaratory Ruling That A&T's Phone-to-Phone IP  
Telephone Services Are Exempt from Access Charges, WC Docket No. 02-361

In the Matter of Developing a Unified Inter-carrier Compensation Regime, WC Docket No. 01-92

Dear Ms. Dortch:

On February 17, 2004, Michael Urdahl and Ken Pfister of Great Plains Communications, Inc. ("Great Plains") met with Jessica Rosenworcel, Competition and Universal Service Legal Advisor to FCC Commissioner Copps, on issues related to the above proceeding.

We urged the Commission to deny AT&T's petition for declaratory ruling to exempt its Voice over Internet Protocol ("VoIP") service from inter-carrier compensation obligations, particularly because of the effects such action would have on universal service to customers in areas of the nation served by rural local exchange carriers. In addition, we recommended that contrary to AT&T's latest recommendation to the FCC, a decision on the AT&T VoIP service should not be deferred to the FCC's inter-carrier compensation docket.

Finally, we challenged AT&T's recent statements before the FCC that inter-carrier compensation will be eliminated in Docket No. 01-92. In rural ILEC service areas, we noted that cost-based inter-carrier compensation should remain part of balanced long-term cost recovery in order to meet customers' universal service needs.

The attachment to this letter was utilized in the presentation. Consistent with Commission rules, one electronic copy of this letter and the attachment are being submitted for the record of both of the above-referenced dockets.

Sincerely,

Ken Pfister  
Vice President-Strategic Policy  
Attachment